

## MADISON COUNTY, NEW YORK

### AMERICANS WITH DISABILITIES ACT (ADA) TRANSITION PLAN

#### ADA Transition Plan

This ADA Transition Plan reflects Madison County's long-term commitment to ADA compliance, and details the stages of Madison County's plan and implementation timeline for: (1) evaluating accessibility by identifying any structural barriers associated with public facilities; (2) identifying accommodations and/or modifications that can be provided to make programs and services accessible; and (3) prioritizing the remediation of any deficiencies and formulating a budget and schedule for those improvements.

This plan also incorporates by reference, Madison County's *draft* ADA Policy as well as the Madison County Department of Social Services ADA Policy 2012 (<https://www.madisoncounty.ny.gov/documentcenter/view/755> ).

This Draft ADA Transition Plan will be revised and updated as the steps of the Plan are completed.

#### INTRODUCTION

ADA regulations prohibit discrimination against individuals on the basis of disability and require state and local governments to make their programs and services accessible to persons with disabilities. These requirements focus on providing accessibility by addressing and eliminating structural barriers associated with public facilities.

As detailed below, Madison County has made a significant and long-term commitment to improving the accessibility of its public facilities. The purpose of this Plan is to ensure that Madison County identifies prohibited structural barriers to its public facilities, and, where structurally feasible, schedules and implements ADA-required improvements in order to remove those barriers.

The ADA requires that the Transition Plan include the following components:

- 1) Identification of physical barriers in a public entity's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
- 2) Identification of the methods to be used to remove any barriers limiting accessibility;
- 3) A schedule for completion of the necessary steps to achieve accessibility in public facilities; and
- 4) The name of the public entity's ADA Coordinator.

## **STEP 1: IDENTIFICATION OF PHYSICAL BARRIERS IN MADISON COUNTY'S FACILITIES**

In October of 2014, Madison County signed a Settlement Agreement ([https://www.ada.gov/madison\\_co\\_ny\\_pca/madison\\_co\\_ny\\_sa.html](https://www.ada.gov/madison_co_ny_pca/madison_co_ny_sa.html)) with the United States in response to a Department of Justice Civil Rights Division compliance review. This Agreement outlines in great detail the steps and requirements for ADA compliance within all levels of Madison County government. The document specifically identifies and calls for the remediation of physical barriers in the areas of, E911, Law Enforcement, Employment, Polling Places, Emergency Management, Emergency Shelters, Sidewalks, Web Access, New Construction, and more.

## **STEP 2: IDENTIFICATION OF METHODS TO REMOVE BARRIERS**

The same Settlement Agreement referenced in Section 1 above also identifies the methods the County will use to remove any identified barriers. The County is in year two of implementation of a detailed workplan for the removal of identified barriers. Many of these tasks have been completed already as outlined in Step 3 below.

## **STEP 3: SCHEDULE FOR COMPLETION OF NECESSARY IMPROVEMENTS**

Madison County's detailed implementation plan and schedule are included in Attachment A. The County is in its 2<sup>nd</sup> year of this implementation effort and the vast majority of projects are already completed or underway.

## **ADA COORDINATOR**

Madison County's ADA Coordinator is:

**ADA Coordinator** - Eric Faisst, Director

**Department** - Madison County Department of Public Health

**Address** - 138 North Court Street,  
Building 5  
Wampsville, NY 13163

**Telephone Number:** 315-366-2361

**Email Address:** [eric.faisst@madisoncounty.ny.gov](mailto:eric.faisst@madisoncounty.ny.gov)

**Attachment A**  
**Madison County, New York**  
**ADA Compliance Progress Report – Year 2**  
**March 21, 2017**

Note: Updated items are highlighted in green

Action Item	DOJ Section	Target Date*	Status	Comments
<ul style="list-style-type: none"> <li>Request in writing to each non-county owned/operated polling place to remove the listed barriers to access within nine (9) months of the effective date of this Agreement. Include copy of ADA survey instrument. Send courtesy copies of the requests to the U.S.</li> </ul>	Section H – Polling Places Paragraph 27	May 22, 2015	Completed	Written requests were sent out in August 2014, soon after we received the initial DOJ Compliance Review report (July 2014). Copies of requests were provided in 2015 report
<ul style="list-style-type: none"> <li>Written request to owners and operators of the shelter facilities to remove the access barriers. Send a courtesy copy of the requests to the U.S.</li> </ul>	Section J – Physical changes to emergency shelters Paragraph 39	May 22, 2015	Completed	Written request sent to the Western and Central NY Region American Red Cross who is responsible for operating emergency shelters in Madison County. Copy of correspondence, and Red Cross' response was provided in 2015 report
<ul style="list-style-type: none"> <li>Incorporate the provisions of Chapter 7 of the ADA Tool Kit into County's Emergency Operations Plan (EOP) its EOP and provide a copy (including supporting documents) to the U.S.</li> </ul>	Section I – Emergency Mgmt Policies & Procedures	June 22, 2015	Completed	The County's Office of Emergency Management has convened a Core Advisory Group (CAG), comprised of various response agencies and including individuals and agencies representing disabled populations to revise the County's EOP to include ADA provisions. The CAG developed the Support Annex for People with Access and Functional Needs. <b>(Attachment A)</b>
<ul style="list-style-type: none"> <li>Publish the Notice in the local newspaper of general circulation serving MC; post the Notice on Internet home page; and post in conspicuous locations in county buildings. Refresh/update notice during term of agreement. MC will provide the Notice to any person upon request.</li> </ul>	Section A - Notification	June 22, 2015	Completed	Notice is distributed to all county employees via email, posted on the county's web page, posted in conspicuous locations in county buildings and published in the local newspaper <b>(Attachment B)</b>

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<ul style="list-style-type: none"> <li>Implement and send the U.S. written procedures to inform interested people with disabilities of the existence and location of the County's accessible programs, services, and activities.</li> </ul>	Section A - Notification	July 2017	In progress	Procedures have been drafted. Currently under review.
<ul style="list-style-type: none"> <li>Contract with an approved Independent Licensed Architect (ILA).</li> </ul>	Section B – Independent Licensed Architect	July 22, 2015	Completed	The County has contracted with Labella & Associates. A copy of the current contract is attached. <b>(Attachment C)</b>
<ul style="list-style-type: none"> <li>ID sources of qualified sign language and oral interpreters, qualified readers, real-time transcription services, and vendors able to put documents in Braille.</li> </ul>	Section D – General Effective Communications	July 22, 2015	Completed	The County contracts with Multicultural Association of Medical/Legal Interpreters (MAMI). Through this contract we have access to alternative communication services, including Braille upon request. <b>(Attachment D)</b> . Additionally, since July 1, 2016, the County's Department of Social Services can access alternative communication formats, including Braille through the New York State Office of Temporary and Disability Assistance. (copy provided in last report). Lastly, Madison County utilizes the New York State Relay Services (aka 711). New York Relay Service is a statewide service that connects standard (voice) telephone users with deaf, hard-of-hearing, deaf-blind, speech-disabled, or late-deafened people who use text telephones (TTYs) or voice carry-over (VCO) phones. This service allows TTY or VCO users to communicate with standard telephone users through specially trained relay operators. Calls can be made to anywhere in the world, 24 hours a day, 365 days a year with no restrictions on the number, length, or type of calls. All calls are strictly confidential and no records of any conversations are maintained. Anyone wishing to use New York Relay simply dials the relay number to connect with a relay operator. The relay operator will dial the requested number and relay

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				the conversation between the two callers. All county employees have access to the NYS Relay Service by dialing 1-800-421-1220. Individuals needing to speak to county representatives can dial 711 or 1-800-421-1220. <a href="http://www.nyrelay.com/">http://www.nyrelay.com/</a>
<ul style="list-style-type: none"> <li>Implement and report to the U.S. written procedures, with time frames, for fulfilling requests for sign language or oral interpreters, qualified readers, real-time transcription services, and documents in alternate formats, including Braille, large print, cassette tapes, and accessible electronic format (e.g., HTML).</li> </ul>	Section D – General Effective Communications	July 22, 2015	Completed	The County contracts with Multicultural Association of Medical/Legal Interpreters (MAMI). Through this contract we have access to alternative communication services, including Braille upon request. <b>(Attachment D)</b> . Additionally, since July 1, 2016, the County's Department of Social Services can access alternative communication formats, including Braille through the New York State Office of Temporary and Disability Assistance. (Copy provided in last report). County employees and residents can access NYS Relay Services that connects standard (voice) telephone users with deaf, hard-of-hearing, deaf-blind, speech-disabled, or late-deafened people who use text telephones (TTYs) or voice carry-over (VCO) phones. This service allows TTY or VCO users to communicate with standard telephone users through specially trained relay operators
<ul style="list-style-type: none"> <li>Ensure that each of its 911 consoles or call stations can receive and respond to TTY communications effectively with an analog TTY or computer equivalent.</li> </ul>	Section E - 911	July 22, 2015	Completed	Since 1998, All 911 consoles/call stations can receive and respond to TTY communications.
<ul style="list-style-type: none"> <li>Develop and send written procedures and details of the 911 TTY calls monitoring to the U.S., or provide sufficient evidence that computerized system ensures that TTY calls are answered as quickly as other calls received.</li> </ul>	Section E - 911	July 22, 2015	Completed	Copy of written procedures of 911 TTY calls was provided in last report.



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<ul style="list-style-type: none"> <li>Incorporate correct TTY call-taking procedures into 911 call takers' performance evaluations.</li> </ul>	Section E - 911	July 22, 2015	Completed	911 Call Takers are evaluated on annual training on TTY communications and department related policies and procedures.
<ul style="list-style-type: none"> <li>Implement the Madison County Sheriff Department's Policy Statement on Effective Communication with People Who are Deaf or Hard of Hearing, Attachment C.</li> </ul>	Section F – Law Enforcement & Effective Communication	July 22, 2015	Completed	Copy of written policy and procedure provided in previous report.
<ul style="list-style-type: none"> <li>Distribute to all sheriff department officers the Guide for Law Enforcement Officers When in Contact with People Who are Deaf or Hard of Hearing, Attachment D.</li> </ul>	Section F – Law Enforcement & Effective Communication	July 22, 2015	Completed	Copies of policy/procedures distributed to all law enforcement staff August 1, 2014. (provided in last report)
<ul style="list-style-type: none"> <li>Hire or contract with local qualified oral and sign language interpreters to be available 24 hours every day to its Sheriff Department.</li> </ul>	Section F – Law Enforcement & Effective Communication	July 22, 2015	Completed	The County contracts with Multicultural Association of Medical/Legal Interpreters (MAMI). Through this contract we have access to alternative communication services, including Braille upon request. ( <b>Attachment D</b> ). County employees and residents have access 24/7/365 to NYS Relay Services that connects standard (voice) telephone users with deaf, hard-of-hearing, deaf-blind, speech-disabled, or late-deafened people who use text telephones (TTYs) or voice carry-over (VCO) phones. This service allows TTY or VCO users to communicate with standard telephone users through specially trained relay operators
<ul style="list-style-type: none"> <li>Equip each Sheriff station and jail sufficient number of working TTY s and videophones, but no fewer than one (1) of each</li> </ul>	Section F – Law Enforcement & Effective Communication	July 22, 2015	Completed	The main Sheriff office is located on the County campus in Wampsville and has a sufficient TTY and video conferencing capability. The Sheriff also maintains four, unmanned field offices throughout the county where TTY communications would not be necessary. A letter to that affect, per DOJ instruction is found in (copy provided last report). County employees and residents have access 24/7/365 to NYS Relay Services that connects standard (voice) telephone users with deaf, hard-of-hearing, deaf-blind, speech-disabled, or late-deafened people who use

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				text telephones (TTYs) or voice carry-over (VCO) phones. This service allows TTY or VCO users to communicate with standard telephone users through specially trained relay operators
<ul style="list-style-type: none"> <li>Where telephone calls are time-limited, adopt policies permitting a longer period of time for individuals using a TTY, videophone, or relay service.</li> </ul>	Section F – Law Enforcement & Effective Communication	July 22, 2015	Completed	Policy and procedure is in place. (copy provided in previous report)
<ul style="list-style-type: none"> <li>Amend employment policies to comply with the U.S. Equal Employment Opportunity Commission regulations, implementing title I of the Americans with Disabilities Act of 1990, codified at 29 C.F.R. Part 1630.</li> </ul>	Section G - Employment	July 22, 2015	Completed	Copy provided in previous report
<ul style="list-style-type: none"> <li>Set up and maintain confidential employee medical records separate from personnel files</li> </ul>	Section G. - Employment	July 22, 2015	Completed	Madison County Personnel Office has maintained separate, confidential employee medical records since 2004.
<ul style="list-style-type: none"> <li>Provide Election Day balloting for voters with disabilities whose assigned polling place has accessibility barriers.</li> </ul>	Section H – Polling Places	July 22, 2015	Completed	Temporary accommodations are made at polling sites, where necessary, so that voters with disabilities can access election day balloting in their assigned locations. (copy provided in previous report)
<ul style="list-style-type: none"> <li>Make all voter registration materials available in alternate formats, including Braille, large print, audio tape, and accessible electronic format (e.g., HTML).</li> </ul>	Section H – Polling Places	July 22, 2015	Completed	Written voter registration material is available from the Board of Elections and posted on the County's web site (copy provided in previous report). Upon request the BOE will provide voter registration materials in alternative formats through the county's contract with MAMI (copy provided in previous report).

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<ul style="list-style-type: none"> <li>Identify and widely publicize to the public and to people with disabilities the most accessible emergency shelters.</li> </ul>	Section J – Physical Changes to Emergency Shelters	July 22, 2015	Completed	The Western and Central NY Region American Red Cross is responsible for operating emergency shelters in Madison County. ARC has provided the County a copy of ADA accessible shelters (copy provided in previous report). In the event of an emergency, the county will widely publicize this list of shelters to the public and to people with disabilities. The County through a NYS Contract has access to alternative forms of communication that will be used to publicize this information.
<ul style="list-style-type: none"> <li>Implement and report to the ILA and the U.S. written process for requesting and receiving input from people with disabilities regarding the accessibility of its sidewalks, including requests to add curb cuts at particular locations.</li> </ul>	Section K – Sidewalks	July 22, 2015	In progress	Process is drafted and under review for approval. At present, any requests are directed to the Building and Maintenance Director who will address each request.
<ul style="list-style-type: none"> <li>Identify and report to the ILA and the U.S. <ul style="list-style-type: none"> <li>Plan for identifying all streets, roads, and highways that have been constructed or altered since January 26, 1992; and</li> <li>A timetable for providing curb ramps or other sloped areas complying with the applicable architectural standards at all intersections of those streets, roads, and highways that have been constructed or altered since January 26, 1992, that have curbs or other barriers from a street level pedestrian walkway.</li> </ul> </li> </ul>	Section K - Sidewalks	July 22, 2015	Complete	NYS Highway Law Section 131 and Madison County Resolution 589-08 (copy provided in previous report) stipulate that Villages, not the County, are responsible for the maintenance and improvements to sidewalks along county roadways. Section 151 of NYS Highway Law covers sidewalks maintained by the Towns. (copy provided in previous report). Maintenance and improvements of sidewalks along any section of county highways is the responsibility of the village or town municipal governments.
<ul style="list-style-type: none"> <li>Identify and report to the ILA and the U.S.: <ul style="list-style-type: none"> <li>A plan for identifying all street level pedestrian walkways that have been constructed or altered since January 26, 1992; and</li> <li>A timetable for providing curb ramps or other sloped areas complying with the applicable architectural standards at all places where those street level</li> </ul> </li> </ul>	Section K - Sidewalks	July 22, 2015	Complete	Copy provided in previous report for walkways, curb ramps or other sloped areas on county property,



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pedestrian walkways constructed or altered since January 26, 1992, intersect with a street, road, or highway.				
<ul style="list-style-type: none"> <li>Domestic Violence Program written information provided in alternate formats, including Braille, large print, audio recording, and electronic formats (e.g., HTML).</li> </ul>	Section O – Programs for Victims of Domestic Violence and Abuse	July 22, 2015	completed	<p>The county contracts with Liberty Resources for domestic violence shelter and service provider. Liberty Resources utilizes Multilingual Interpretation Services to provide information in alternative formats, and Whole Me Interpreting Services for individuals who are hard of hearing. (Attachment E) Liberty Resource has TTY capabilities as well as employees and residents have access 24/7/365 to NYS Relay Services that connects standard (voice) telephone users with deaf, hard-of-hearing, deaf-blind, speech-disabled, or late-deafened people who use text telephones (TTYs) or voice carry-over (VCO) phones. Liberty Resources offers electronic versions of the program's brochure, hosted on its website: <a href="http://www.helpstorehopecenter.org/resources">http://www.helpstorehopecenter.org/resources</a> and can be read by text to speech accessibility for the vision impaired.</p>
<ul style="list-style-type: none"> <li>Contract or make other arrangements with qualified sign language and oral interpreters to ensure their availability when required.</li> </ul>	Section O – Programs for Victims of Domestic Violence and Abuse	July 22, 2015	completed	<p>The county contracts with Liberty Resources for domestic violence shelter and service provider. Liberty Resources utilizes Multilingual Interpretation Services to provide information in alternative formats, and Whole Me Interpreting Services for individuals who are hard of hearing. (Attachment E) Liberty Resource has TTY capabilities as well as employees and residents have access 24/7/365 to NYS Relay Services that connects standard (voice) telephone users with</p>

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				deaf, hard-of-hearing, deaf-blind, speech-disabled, or late-deafened people who use text telephones (TTYs) or voice carry-over (VCO) phones. This service allows TTY or VCO users to communicate with standard telephone users through specially trained relay operators. Additionally, since July 1, 2016, the County's Department of Social Services, who contracts with Liberty Resources, is able to access alternative communication formats through the New York State Office of Temporary and Disability Assistance. (copy provided in previous report)
<ul style="list-style-type: none"> <li>Ensure Domestic Violence Programs hotline (if any) provides equivalent service for people who use TTY s, including providing direct-connection service for TTY users with hotline operators, without requiring TTY users to call through a third party operator, such as through the state or local Telecommunication Relay Services. <ul style="list-style-type: none"> <li>Obtain the necessary equipment,</li> <li>Establish the written procedures, and</li> <li>Provide training</li> </ul> </li> </ul>	Section O – Programs for Victims of Domestic Violence and Abuse	July 2017	In progress	The County DSS has TTY capabilities (see <b>Attachment F</b> ) as well as access to NYS Relay Services. Liberty Resource has TTY capabilities as well as employees and residents have access 24/7/365 to NYS Relay Services that connects standard (voice) telephone users with deaf, hard-of-hearing, deaf-blind, speech-disabled, or late-deafened people who use text telephones (TTYs) or voice carry-over (VCO) phones. This service allows TTY or VCO users to communicate with standard telephone users through specially trained relay operators. Liberty Resources just recently bought Aurora Program, a non-profit organization dedicated exclusively to promoting independence and opportunity for individuals who are experiencing a sensory loss and is working with them to update and revise their policies.
<ul style="list-style-type: none"> <li>Survey facilities used as shelters or designated as potential shelters – or for counseling, job training, education, clothing or household provisioning, or other aspects of Domestic Violence Programs - to ensure that adequate arrangements are available for potential clients and family members with</li> </ul>	Section O – Programs for Victims of Domestic Violence and Abuse	July 22, 2015	completed	The county contracts with Liberty Resources for domestic violence shelters. The NY State Office of Children and Family Services is responsible for surveying DVP facilities in accordance with the regulations promulgated and adopted by the Office of Children and Family Services.

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disabilities.				(Attachment G)
<ul style="list-style-type: none"> <li>Until there is a sufficient stock of accessible housing and other facilities within the sheltering program, the County will implement written procedures ensuring that it has identified temporary accessible housing and other facilities that could be used if people with disabilities need sheltering or in-service access to a Domestic Violence Program.</li> </ul>	Section O – Programs for Victims of Domestic Violence and Abuse	July 22, 2015	Completed	The county contracts with Liberty Resources for domestic violence shelter and service provider. A copy of the contract is found in <b>Attachment H</b>
<ul style="list-style-type: none"> <li>Implement written procedures and modify, as appropriate, eligibility criteria, to ensure that no person with a disability is turned away from a shelter or otherwise denied the opportunity to benefit from the services of the County's Domestic Violence Programs.</li> </ul>	Section O – Programs for Victims of Domestic Violence and Abuse	July 2017	In progress	The county contracts with Liberty Resources for domestic violence shelter and service provider. (Attachment H). Liberty Resources just recently bought Aurora Program, a non-profit organization dedicated exclusively to promoting independence and opportunity for individuals who are experiencing a sensory loss and is working with them to update and revise their policies.
<ul style="list-style-type: none"> <li>Implement written procedures to regarding people with disabilities who use service animals.</li> </ul>	Section O – Programs for Victims of Domestic Violence and Abuse	July 2017	In progress	The county contracts with Liberty Resources for domestic violence shelter and service provider. Liberty Resources just recently bought Aurora Program, a non-profit organization dedicated exclusively to promoting independence and opportunity for individuals who are experiencing a sensory loss and is working with them to update and revise their policies. See <b>Attachment F</b> for County DSS written procedures regarding service animals.

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<ul style="list-style-type: none"> <li>Implement written procedures to ensure that reasonable modifications are made to the County's Domestic Violence Programs when necessary for a client or family member with a disability to participate in such programs, unless doing so would fundamentally alter the nature of the program.</li> </ul>	Section O – Programs for Victims of Domestic Violence and Abuse	July 2017	In progress	The county contracts with Liberty Resources for domestic violence shelter and service provider. Liberty Resources just recently bought Aurora Program, a non-profit organization dedicated exclusively to promoting independence and opportunity for individuals who are experiencing a sensory loss and is working with them to update and revise their policies.. See <b>Attachment F</b> for County DSS written procedures.
<ul style="list-style-type: none"> <li>Implement written policies to ensure that despite any "drug-free" policy of the County's Domestic Violence Programs, people with disabilities who use medication prescribed for their use are able to continue using such medication while participating in such programs or being housed in a shelter.</li> </ul>	Section O – Programs for Victims of Domestic Violence and Abuse	July 2017	In progress	The county contracts with Liberty Resources for domestic violence shelter and service provider. Liberty Resources just recently bought Aurora Program, a non-profit organization dedicated exclusively to promoting independence and opportunity for individuals who are experiencing a sensory loss and is working with them to update and revise their policies.. See <b>Attachment F</b> for County DSS written procedures.
<ul style="list-style-type: none"> <li>ILA will survey all polling places not surveyed by the U.S. using tool (attachment F)</li> </ul>	Section H – Polling Places Paragraph 29	July 2017	In progress	The ILA surveyed all facilities not surveyed by the US DOJ except for two locations (Cazenovia High School and the Lincoln Firehouse). Cazenovia High School is no longer a polling site used by the county, and the Lincoln Firehouse was under construction at the time of the ILA survey. BOE will be surveying all polling sites in the Spring of 2017.
<ul style="list-style-type: none"> <li>ILA will survey voter registration locations for accessibility using the form (Attachment F) and report the results to the U.S. DOJ</li> </ul>	Section H – Polling Places Paragraph 32	July 2017	In progress	The Board of Elections office located in the County facility in Wampsville is the only county run voter registration location. Although surveyed during the DOJ visit, the BOE office was relocated to a more accessible location in the building at the end of 2016. The ILA surveyed the new BOE office in January 2017. Results of survey can be found in <b>Attachment I</b> .



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<ul style="list-style-type: none"> <li>County will remove the barriers and have the ILA confirm the same to the U.S. or report to the U.S. its plan to provide program access and verified to be accessible by the ILA.</li> </ul>	Section H – Polling Places Paragraph 29	October 2017	In progress	BOE will work with the polling sites to implement recommendations.
<ul style="list-style-type: none"> <li>Submit a written report to the ILA and the U.S., summarizing the actions taken and providing evidence establishing compliance with the applicable architectural standard as permitted by 28 C.F.R. § 35.151(c) and its Appendix</li> </ul>	Section M – New Construction, Alterations, and Physical changes to facilities.	2018	In progress	See <b>Attachment I</b> for progress on various projects.
<ul style="list-style-type: none"> <li>ILA to survey all facilities that are the subject of this Agreement for the purpose of identifying those that have multiple entrances, not all of which are accessible.</li> </ul>	Section M – New Construction, Alterations, and Physical changes to facilities.	2018	In progress	See <b>Attachment I</b> for progress on various projects.
<ul style="list-style-type: none"> <li>Install directional signage at all inaccessible entrances to each of its facilities and will place the international symbol for accessibility at each accessible entrance to a facility, in accordance with 28 C.F.R. § 35.136(b).</li> </ul>	Section M – New Construction, Alterations, and Physical changes to facilities.	2018	In progress	See <b>Attachment I</b> for progress on various activities.
<ul style="list-style-type: none"> <li>Submit for pre-approval by the U.S. a proposed training program on the requirements of the ADA and appropriate ways of serving people with disabilities.</li> </ul>	Section P – Miscellaneous Provisions	October 22, 2015	Completed	Training materials were submitted to and approved by DOJ via email correspondence. (copy provided in previous report) At present, there are no county employees that require the training materials in a format different from what was approved. Should an employee request the training in an alternative format, the county will accommodate that request.
<ul style="list-style-type: none"> <li>ILA survey all facilities listed in Attachment E to determine whether the listed barriers have been removed.</li> </ul>	Section H – Polling Places	April 22, 2016	Completed	ILA has surveyed all facilities listed in attachment E. The ILA provided recommendations for addressing barriers identified in these polling sites (copy provided in previous report). BOE will be surveying all sites in 2017 and will work with the polling sites to implement ILA recommendations.

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<ul style="list-style-type: none"> <li>ILA will survey the shelters listed in Attachment G to determine whether the noted barriers have been removed.</li> </ul>	Section J – Physical Changes to Emergency Shelters	April 22, 2016	Completed	The County does not operate emergency shelters. The Local American Red Cross operates the shelters. American Red Cross has indicated to the county via email correspondence that the emergency shelter sites are ADA compliant. (copy provided in previous report)
<ul style="list-style-type: none"> <li>Designate an employee as the web accessibility coordinator.</li> </ul>	Section L – Web-Based Services and Programs	September 2017	Completed	The County's Director of Information Technology is the designated web accessibility coordinator.
<ul style="list-style-type: none"> <li>Adopt, implement, and post online a policy that its web pages will comply with WCAG 2.0 AA, published by the World Wide Web Consortium (W3C), Web Accessibility Initiative (WAI), available at <a href="http://www.w3.org/TR/WCAG">www.w3.org/TR/WCAG</a>;</li> </ul>	Section L – Web-Based Services and Programs	September 2017	In progress	<p>County is currently working with a web site developer CivicPlus, to develop a new county web site presence. CivicPlus does base their websites on WCAG 2.0 A and AA compliance. Policies will be developed in concert with the web site.</p> <p>On May 9, 2016 Vol. 81, No. 89 of the Federal Register was published regarding 28 CFR Part 35 - Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities; Proposed Rules. Within that document it stated that "The Department of Justice (Department) is considering revising the regulation implementing title II of the Americans with Disabilities Act (ADA or Act) in order to establish specific technical requirements to make accessible the services, programs, or activities State and local governments offer to the public via the Web."</p> <p>The County submitted a letter to the USDOJ, dated June 6, 2016 (<b>Attachment J</b>), requesting a modification of the Agreement relative to the Web-based Services and Program provision such that its obligation under 49-51 is delayed until that date that DOJ regulations are actually</p>

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				effective. No response from the USDOJ has been received to date.
<ul style="list-style-type: none"> <li>Distribute the policy to all employees and contractors who design, develop, maintain, or otherwise have responsibility for its websites, or provide website content, technical support, or customer service;</li> </ul>	Section L – Web-Based Services and Programs	September 2017	In progress	County is currently working with a web site developer CivicPlus, to develop a new county web site presence. CivicPlus does base their websites on WCAG 2.0 A and AA compliance. Policies will be developed in concert with the web site.
<ul style="list-style-type: none"> <li>Provide training to website content personnel</li> </ul>	Section L – Web-Based Services and Programs	September 2017	In progress	County is currently working with a web site developer CivicPlus, to develop a new county web site presence. CivicPlus does base their websites on WCAG 2.0 A and AA compliance. Training will be provided once web site is developed.
<ul style="list-style-type: none"> <li>Incorporate provisions ensuring that all of the County's webpages comply with WCAG 2.0 AA into the performance evaluations of the web accessibility coordinator and all employees and contractors who design, develop, maintain, or otherwise have responsibility for its websites, or provide website content, technical support, or customer service</li> </ul>	Section L – Web-Based Services and Programs	September 2017	In progress	County is currently working with a web site developer CivicPlus, to develop a new county web site presence. CivicPlus does base their websites on WCAG 2.0 A and AA compliance. Policies will be developed in concert with the web site.
<ul style="list-style-type: none"> <li>Assess all existing web content and online services for conformance with WCAG 2.0 AA, by: <ul style="list-style-type: none"> <li>perform automated accessibility tests of website and all online services, using an automated tool approved by the U.S.,</li> </ul> </li> </ul>	Section L – Web-Based Services and Programs	September 2017	In progress	County is currently working with a web site developer CivicPlus, to develop a new county web site presence. CivicPlus does base their websites on WCAG 2.0 A and AA compliance.
<ul style="list-style-type: none"> <li>Provide a notice, prominently and directly linked from its homepage, instructing visitors to its websites on how to request accessible information.</li> </ul>	Section L – Web-Based Services and Programs	September 2017	In progress	County is currently working with a web site developer CivicPlus, to develop a new county web site presence. CivicPlus does base their websites on WCAG 2.0 A and AA compliance.

Action Item	DOJ Section	Target Date*	Status	Comments
<ul style="list-style-type: none"> <li>Provide a notice, prominently and directly linked from its homepage, soliciting feedback from visitors to its websites on how to improve website accessibility.</li> </ul>	Section L – Web-Based Services and Programs	September 2017	In progress	County is currently working with a web site developer CivicPlus, to develop a new county web site presence. CivicPlus does base their websites on WCAG 2.0 A and AA compliance.
<ul style="list-style-type: none"> <li>Ensure that websites and all online services, including those websites or online services provided by third parties upon whom the County relies to provide services or content, comply with, at minimum, WCAG 2.0 AA.</li> </ul>	Section L – Web-Based Services and Programs Paragraph 51a	September 2017	In progress	County is currently working with a web site developer CivicPlus, to develop a new county web site presence. CivicPlus does base their websites on WCAG 2.0 A and AA compliance.
<ul style="list-style-type: none"> <li>The ILA will survey all County facilities for compliance with title II of the ADA that the U.S. did not survey.</li> </ul>	Section M – New Construction, Alterations, and Physical changes to facilities.	April 22, 2016	Completed	All county sites were surveyed during initial DOJ visit.
<ul style="list-style-type: none"> <li>Submit to the U.S. a detailed report from the ILA listing the access issues identified during the ILA's review, together with the corrective actions and completion dates proposed to resolve such issues. The proposed completion dates may be no later than six (6) months prior to the termination of this Agreement (Dec. 21, 2016).</li> </ul>	Section M – New Construction, Alterations, and Physical changes to facilities.	April 22, 2016	Completed	All county sites were surveyed during the initial DOJ visit.
<ul style="list-style-type: none"> <li>Modify each such facility to remove the barriers or, alternatively, procure another, fully accessible facility to ensure that potential clients and family members with disabilities have integrated options when participating in a sheltering or other Domestic Violence Program.</li> </ul>	Section O – Programs for Victims of Domestic Violence and Abuse Paragraph 62d	April 22, 2016	Completed	Provided in previous report.
<ul style="list-style-type: none"> <li>Train employees who have direct contact with members of the public will be trained on the requirements of the ADA and appropriate ways of serving people with disabilities.</li> </ul>	Section P – Miscellaneous Provisions	April 22, 2016	Completed	ADA training for employees provided in March 2016, and annually thereafter. A list of employees trained is found in <b>Attachment K</b>
<ul style="list-style-type: none"> <li>County will Identify alternate fully accessible polling place based on ILA survey</li> </ul>	Section H – Polling Places Paragraph 28	October 22, 2016	Completed	Temporary accommodations are made at polling sites, where necessary, so that voters with disabilities can access election day balloting in



Action Item	DOJ Section	Target Date*	Status	Comments
				their assigned locations. (copy provided in last report)
<ul style="list-style-type: none"> <li>County will identify an appropriate number of alternate accessible shelters, as confirmed by the ILA using the survey instrument entitled ADA Checklist for Emergency Shelters, Attachment N.</li> </ul>	Section J – Physical Changes to Emergency Shelters Paragraph 40	October 22, 2016	Completed	The Local American Red Cross is responsible for operating emergency shelters in Madison County. Red Cross has provided a list of emergency shelters in Madison County which they attest are ADA compliant. Copy provided in previous report.
<ul style="list-style-type: none"> <li>Provide curb ramps or other sloped areas complying with the applicable architectural standards at all intersections of the streets, roads, and highways constructed or altered since January 26, 1992, that have curbs or other barriers from a street level pedestrian walkway.</li> </ul>	Section K - Sidewalks	July 22, 2017	In progress	See <b>Attachment I</b>
<ul style="list-style-type: none"> <li>Completion of all required, approved curb ramps or other sloped area projects/timetable identified in plan.</li> </ul>	Section K - Sidewalks	April 22, 2018	In progress	See <b>Attachment I</b>
<ul style="list-style-type: none"> <li>Completion of approved required curb ramps or other sloped areas.</li> </ul>	Section K - Sidewalks	April 22, 2018	In progress	See <b>Attachment I</b>
<ul style="list-style-type: none"> <li>County will submit ILA certifications along with its reporting requirements <ul style="list-style-type: none"> <li>The ILA will prepare reports to U.S. using U.S. certification form</li> </ul> </li> <li>County will provide prior notice to the U.S. of inspections by the ILA.</li> </ul>	Section B – Independent Licensed Architect	As remediation activities are completed  As needed	Completed	See <b>Attachment O</b>
<ul style="list-style-type: none"> <li>Train employees in using the New York Relay Service to make and receive calls, and</li> <li>Report to the U.S. the details of the trainings and employees trained.</li> </ul>	Section D – General Effective Communication Provisions	TBD  TBD	In progress	Employees in the 911 call center are trained on TTY equipment and policies and procedures upon initial hire and annually thereafter. See <b>Attachment L</b>
<ul style="list-style-type: none"> <li>Adopt and implement ADA Checklist (Attachment F) for polling places</li> </ul>	Section H – Polling Places	TBD	Completed	<ul style="list-style-type: none"> <li>The County utilizes the ADA checklist when surveying polling sites.</li> </ul>

Action Item	DOJ Section	Target Date*	Status	Comments
<ul style="list-style-type: none"> <li>Remove barriers to access at polling places owned by the County as listed in Attachments I, J, and K.</li> <li>For each surveyed polling place, the County will then either: <ul style="list-style-type: none"> <li>remove all barriers to access and have the ILA confirm this to the U.S.; or</li> <li>Identify an alternate polling place and remove barriers. ILA confirmation needed</li> </ul> </li> <li>County will identify and widely publicize to the public, people with disabilities, and organizations serving people with disabilities the most accessible polling place(s) in each precinct and voting district. [Until accessibility addressed by previous action items]</li> <li>Train poll workers on the rights of people with disabilities and the practical aspects of assuring those rights.</li> </ul>		<p>TBD</p> <p>Before the next election occurring nine (9) months or later after the effective date of this Agreement.</p> <p>No time frame w/in 1 mth prior to next election, and annually thereafter</p>		<ul style="list-style-type: none"> <li>Copy provided in previous report</li> <li>Temporary accommodations are made at polling sites, where necessary, so that voters with disabilities can access Election Day balloting in their assigned locations. (copy provided in previous report)</li> <li>County BOE will survey all polling sites in Spring 2017</li> <li>Polling place information is publicized via the county web site, through municipal office communications and when an individual registers they receive a post card indicating the polling site near them. To date, the BOE has not received any requests for polling site information to be provided in an alternative format. Should the BOE receive such a request, the BOE will make the information available in the alternative format requested.</li> <li>All poll workers receive training on the rights of people with disabilities and the practical aspects of assuring those rights. Training materials are the same as what was submitted in previous report. See <b>Attachment M</b> for list of individuals who received this training in 2016.</li> </ul>
<ul style="list-style-type: none"> <li>ILA will confirm to the U.S. that the County has provided curb ramps or other sloped areas where required and in accordance with the approved plan and timetable.</li> <li>Provide curb ramps or other sloped areas complying with the 2010 ADA Standards at any intersection having curbs or other barriers to entry from a street level pedestrian walkway, whenever a street, road, or highway is constructed or altered.</li> </ul>	Section K - Sidewalks	<p>Within 3 mths after completion of work</p> <p>Immediately</p> <p>Annually</p>	In progress	See <b>Attachment I</b>

Action Item	DOJ Section	Target Date*	Status	Comments
<ul style="list-style-type: none"> <li>ILA confirm to the U.S. that the County has provided curb ramps or other sloped areas where required that are in compliance with the 2010 ADA Standards.</li> <li>ILA confirm to the U.S. that the County has provided curb ramps or other sloped areas where required that are in compliance with the 2010 ADA Standards.</li> <li>Provide curb ramps or other sloped areas complying with the 2010 ADA Standards at all newly constructed or altered pedestrian walkways where they intersect a street, road, or highway.</li> <li>ILA will confirm to the U.S. that the County has provided curb ramps or other sloped areas where required that are in compliance with the 2010 ADA Standards.</li> </ul>		Annually  Immediately  Annually		
<ul style="list-style-type: none"> <li>Retain an independent consultant, approved by the U.S to evaluate the County's website and any proposed online services for compliance with the ADA</li> </ul>	Section L – Web-based Services and Programs	Annually	In progress	County is currently working with a web site developer CivicPlus, to develop a new county web site presence. CivicPlus does base their websites on WCAG 2.0 A and AA compliance.
<ul style="list-style-type: none"> <li>Altered Facilities: the County will take the actions listed in Attachments J and M to make the altered parts of County facilities for which alterations commenced after January 26, 1992, readily accessible to and usable by people with disabilities.</li> <li>Program Access in Existing Facilities: the County will take the actions listed in Attachments K and M to make each of the County's programs, services, and activities operating at a facility that is the subject of this Agreement, when viewed in its entirety, readily accessible to and usable by people</li> </ul>	Section M – New Construction, Alterations, and Physical Changes to Facilities	Completion dates reflected in Attachments I, J, K, and M.  NA	In progress	See Attachment I

Action Item	DOJ Section	Target Date*	Status	Comments
with disabilities.				
<ul style="list-style-type: none"> <li>Review compliance with the requirements of title II of the ADA for those County facilities and programs that the U.S. did not survey or review.</li> </ul>				
<ul style="list-style-type: none"> <li>County will take the actions listed in Attachments L and M.</li> </ul>	Section N – Program Modifications	See attachments	In progress	See <b>Attachment I</b>
<ul style="list-style-type: none"> <li>Maintain the accessibility of its programs, activities, services, facilities, and equipment, including routinely testing accessibility equipment and routinely auditing the accessibility of its programs and facilities.</li> </ul>	Section P – Miscellaneous Provisions	Ongoing		
<ul style="list-style-type: none"> <li>Submit to the U.S. the list of employees trained.</li> </ul>		Within 30 days after each training	In progress	